

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Patrick G. Scullion

Debtor

FREEDOM MORTGAGE CORPORATION

Secured Creditor

vs.

Patrick G. Scullion

Debtor

Robert H. Holber Esq.

Trustee

CHAPTER 7

NO. 18-18200 ELF

11 U.S.C. Section 362

**STIPULATION**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

The Automatic Stay of all proceedings, as provided under Section 362 of the Bankruptcy Reform Act of 1978 (The Code) 11 U.S.C. Section 362, is modified and annulled to allow FREEDOM MORTGAGE CORPORATION and its successor in title to proceed with receiving the post-sale distribution of funds from the Bucks County Sheriff's Office from the March 8, 2019 sale regarding the premises 292 Indian Creek Drive, Levittown, PA 19057. The stay provided by Bankruptcy Rule 4001(a)(3) has been waived.

IT IS FURTHER STIPULATED AND VOLUNTARILY AGREED THAT:

1. The recitals are incorporated herein and made a part hereof;
2. 292 Indian Creek Drive, Levittown, PA 19057 (the "Property") went to Sheriff's Sale in Bucks County on March 8, 2019 pursuant to the foreclosure judgment held by Secured Creditor;
3. Debtor agrees that the March 8, 2019 sale is valid as the automatic stay was not in effect as it occurred during the time period that the instant bankruptcy action was dismissed;
4. Debtor agrees that the Bucks County Sheriff may now distribute any post-sale funds to Secured Creditor from the March 8, 2019 sale;

5. This Stipulation represents the totality of the agreement between the parties;
6. Any modifications, retractions or revisions must be in writing and signed by all parties;
7. The parties agree that a facsimile signature shall be considered an original signature.

Date: April 1, 2019

By: /s/ Rebecca A. Solarz, Esquire  
Attorney for Movant

Date: April 17, 2019

/s/John M. Kenney, Esq.  
John M. Kenney, Esquire  
Attorney for Debtor

## **ORDER**

Approved by the Court this 22nd day of April, 2019.



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**ERIC L. FRANK**  
**U.S. BANKRUPTCY JUDGE**